

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
GREEN COPPER HOLDINGS, LLC)	CASE NO. 25-10088-M
EIN # xx-xxx9708)	Chapter 7
)	
)	
Debtor.)	

TRUSTEE'S MOTION TO EMPLOY EXPERT

Comes now the Trustee and states:

1. The Trustee seeks authority to employ an expert forensic accountant for various reasons:
to provide expert assistance and/or testimony relative to anticipated avoidance claims; to review bank statements for the Debtor and various affiliated entities for purposes of investigating possible transfers and inter-company transactions; to assist the Trustee in identifying possible bidders relative to proposed sale of assets.
2. DR Payne and Associates ("Payne") is qualified and competent to provide those services.
Attached as **Ex A** is a specification of the individuals and their hourly rates who will work on this project.
3. Payne is not a creditor of this estate and does not hold or represent an interest that is adverse to the interests of this estate. Payne is not connected to the U.S. Trustee's office in any manner. Payne is a disinterested person as defined by the bankruptcy code. Attached as **Ex B** is his affidavit of disinterestedness.

Wherefore the Trustee prays for an order authorizing the employment of Payne for the reasons stated herein.

Respectfully Submitted By:

s/ Patrick J. Malloy III
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